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June 18, 2018

VIA ECF

Honorable Andrew L. Carter, Jr.
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

RE: United States v. Ali Sadr Hashemi Nejad, 18 Cr. 224 (ALC)—Scheduling

Dear Judge Carter:

This Firm represents Mr. Ali Sadr Hashemi Nejad (“Mr. Sadr”) in the above-referenced matter. We write to request that the upcoming status conference—currently scheduled for Wednesday, June 20, 2018—be rescheduled for a later date. This is our first request. As the Court knows, the defense has been working tirelessly on bail proceedings in this matter for many weeks; and Mr. Sadr’s bail conditions were met just last week. Now that the bail proceedings are complete, we respectfully request that the Court reschedule this week’s status conference for a date during the week of July 16, 2018 to allow the parties to prepare and to consider proposed scheduling for the case in advance of the next conference. The government consents to this scheduling request. Both parties consent to the exclusion of time.

SO ORDERED:

Time is excluded under the Speedy Trial Act for this complex case in the interests of justice under 18 U.S.C. § 3161(h)(7)(A) and (B), to allow the parties time for adequate preparation. The new status conference is scheduled for July ___, 2018 at ____.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tal Machnes".

Tal Machnes

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

cc: All ECF Counsel